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Attorneys for Plaintiff

UNITED STATES DISTRICT COURT

DISTRICT OF ARIZONA

Valentino Dimitrov, individually, and on  
behalf of all others similarly situated;

Plaintiff,

v.

Stavatti Aerospace, Ltd, a Minnesota  
corporation; Stavatti Aerospace, Ltd, a  
Wyoming corporation; Stavatti  
Corporation, a Minnesota corporation;  
Stavatti Immobiliare Ltd, a Wyoming  
corporation; Stavatti Industries, Ltd, a  
Wyoming corporation; Stavatti Niagara,  
Ltd., a New York corporation Stavatti  
Super Fulcrum, Ltd, a Wyoming  
corporation; Stavatti Ukraine, a Ukrainian  
business entity; Stavatti Heavy Industries  
Ltd, a Hawaii corporation; Christopher  
Beskar and Maja Beskar, husband and  
wife; Brian Colvin and Corrina Colvin,  
husband and wife; John Simon and Jean  
Simon, husband and wife; William  
Mcewen and Patricia Mcewen, husband  
wife; Rudy Chacon and Jane Doe Chacon,  
husband and wife; and Does 1 through 10,  
inclusive

Defendants.

Case No. 2:23-CV-00226-PHX-DJH

**STIPULATED MOTION TO  
AMEND THE SCHEDULING  
ORDER**

(Assigned to the Honorable Diane J.  
Humetewa)

The parties, by and through undersigned counsel, have conferred regarding ongoing  
discovery matters and have decided they would benefit from a minor modification to the scheduling

1 order; specifically, amendment of Paragraph 4 of the Scheduling Order to change the deadline for  
2 completing fact discovery from September 30, 2024, to November 30, 2024. Accordingly, the  
3 parties hereby move the Court to enter the attached proposed order.

4  
5 **RESPECTFULLY SUBMITTED** this 16th day of August 2024

6 Enara Law PLLC

7 BY /s/ George Chebat  
8 George Chebat

9 The Law Office of Terrance D. Dunmire

10 BY /s/ Terry Dunmire  
11 Terrance D. Dunmire (filed with permission)

12 The Law Office of Nino Abate PLC

13 BY /s/ Nino Abate  
14 Nino Abate (filed with permission)

**CERTIFICATE OF SERVICE**

I hereby certify that on the 16th day of August 2024, a copy of the foregoing was transmitted electronically to the CM/ECF filing system for filing and transmittal along with copies transmitted to all parties and counsel of record via the CM/ECF system.

By: Shelly N. Witgen, ACP